PD-0018&0019-22
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
Transmitted 3/3/2022 10:18 AM
Accepted 3/3/2022 11:08 AM
DEANA WILLIAMSON

No. PD-0018-0019-22

TO THE COURT OF CRIMINAL APPEALS FILED COURT OF CRIMINAL APPEALS 3/4/2022 OF THE STATE OF TEXAS DEANA WILLIAMSON, CLERK

THE STATE OF TEXAS, Appellant

V.

SEBASTIAN TORRES, Appellee

Appeal from Hidalgo County Nos. 13-20-00101-CR & 13-20-00102-CR

* * * * *

STATE'S MOTION FOR LEAVE TO FILE LETTER REPLY TO APPELLEE'S RESPONSE TO ITS PETITION FOR DISCRETIONARY REVIEW

> Stacey M. Soule State Prosecuting Attorney Bar I.D. No. 24031632

* * * * *

John R. Messinger
Assistant State Prosecuting Attorney
Bar I.D. No. 24053705
P.O. Box 13046
Austin, Texas 78711
512/463-1660 (Telephone)
512/463-5724 (Fax)
information@spa.texas.gov

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

Appellee filed a response to the State's petition for discretionary review alleging, in part, that the issue presented for review was not preserved in the trial court. In order to assist the Court, the State offers a brief reply that points out in the record where the relevant arguments were made.

PRAYER FOR RELIEF

WHEREFORE, the State of Texas prays that the Court of Criminal Appeals grant leave to file the State's reply.

Respectfully submitted,

/s/ John R. Messinger
JOHN R. MESSINGER
Assistant State Prosecuting Attorney
Bar I.D. No. 24053705

P.O. Box 13046 Austin, Texas 78711 information@spa.texas.gov 512/463-1660 (Telephone)

CERTIFICATE OF SERVICE

The undersigned certifies that on March 3, 2022, the State's Motion for Leave to File was filed and served electronically on the parties below:

Alexandria Lynn Barrera Starr County Assistant District Attorney 401 N. Britton Ave., Suite 417 Rio Grande City, Texas 78582 alexandria.barrera@da.co.starr.tx.us

Abner Burnett
Texas Rio Grande Legal Aid, Inc.
Public Defender Program
308 E. Harrison
Harlingen, Texas 78550
Aburnett@trla.org

/s/ John R. Messinger
JOHN R. MESSINGER
Assistant State Prosecuting Attorney

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Stacey Soule on behalf of John Messinger Bar No. 24053705 information@spa.texas.gov Envelope ID: 62257028 Status as of 3/3/2022 11:08 AM CST

Associated Case Party: State Prosecuting Attorney

Name	BarNumber	Email	TimestampSubmitted	Status
John R.Messinger		information@spa.texas.gov	3/3/2022 10:18:16 AM	SENT

Associated Case Party: SEBASTIAN TORRES

Name	BarNumber	Email	TimestampSubmitted	Status
Linda Icenhauer-Ramirez		ljirlaw@gmail.com	3/3/2022 10:18:16 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Alexandria LynnBarrera		alexandria.barrera@da.co.starr.tx.us	3/3/2022 10:18:16 AM	SENT
Abner Burnett		Aburnett@trla.org	3/3/2022 10:18:16 AM	SENT